

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA   )  
  )  
vs.    ) No. 03-30047-MAP  
  )  
MELVIN RICHARDSON                    )

**MOTION TO ENLARGE THE TIME FOR FILING OBJECTIONS TO PRESENTENCE  
REPORT AND MOTION TO CONTINUE SENTENCING DATE**

Now comes Melvin Richardson, the defendant in the above entitled action, and moves this Honorable Court for an order enlarging the time within which to file objections to the Presentence Report and to continue date for sentencing, and as his basis, therefore, asserts the following;

Counsel received an addendum to the presentence report today and counsel for the defendant has to attend funeral services for a close friend on September 21, 2006, the same day that sentencing is scheduled.

WHEREFORE, counsel for the defendant requests another date convenient to all parties.

DEFENDANT

BY: /s/ Vincent A. Bongiorno, Esq.  
95 State Street - Suite #309  
Springfield, MA 01103  
(413) 732-0222  
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq. do hereby certify that I have served a copy of the foregoing via CM/ECF to the Assistant United States Attorney, Paul Smyth, Esq., United States District Court, 1550 Main Street, Springfield, MA. 01103 this 18<sup>th</sup> day of September 2006.

/s/ Vincent A. Bongiorno